

EXHIBIT A

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

-----X
ZINAIDA KAKAURIDZE,

Plaintiff,

- against -

TARGET CORPORATION and UE KINGSWOOD TWO
LLC,

Defendant.
-----X

Index No:
Date Filed:

Plaintiff designates Kings
County as the place of trial.

SUMMONS

The basis of venue is CPLR
503.

The county in which the
cause of action arose.

TO THE ABOVE-NAMED DEFENDANT:

YOU ARE HEREBY SUMMONED to answer the complaint in this action and to serve a copy of your answer on the Plaintiff's Attorneys within twenty (20) days after the service of this summons, exclusive of the day of service, where service is made by delivery upon you personally within the state, or within thirty (30) days after completion of service where service is made in any other manner. In case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

Dated: Brooklyn, New York
October 21, 2020

RATSENBERG & ASSOCIATES, P.C.

Yours etc.,

BY: S.G. Ovadia

STEPHANIE G. OVADIA, ESQ.

Attorneys for Plaintiff

ZINAIDA KAKAURIDZE

2579 East 17th Street, Suite 51

Brooklyn, New York 11235

(718) 676-5757

To: TARGET CORPORATION
1000 NICOLLET MALL
MINNEAPOLIS, MN 55403

UE KINGSWOOD TWO LLC
CT CORPORATION SYSTEM
28 LIBERTY STREET
NEW YORK, NEW YORK, 10005

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COUNTY OF KINGS

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TARGET CORPORATION and UE KINGSWOOD TWO
LLC,

COMPLAINT

Defendant.
-----X

Plaintiff, by her attorneys, **RATSENBERG & ASSOCIATES, P.C.**, complaining of Defendant herein, respectfully states and alleges, upon information and belief, as follows:

1. Plaintiff, ZINAIDA KAKAURIDZE, at all times of the institution of this action, was and still is a resident of the County of Kings, City and State of New York.

2. Upon information and belief, that at all times hereinafter mentioned, the Defendant, TARGET CORPORATION, at all times of the institution of this action, was and still is a foreign business corporation, duly organized and existing under the laws of the state of Minnesota, with its principal offices located at 1000 Nicollet Mall, Minneapolis, MN 55403.

3. Upon information and belief, at all times hereinafter mentioned, the defendant, TARGET CORPORATION, transacted business within the State of New York; regularly did or solicited business within the State of New York or engaged in other persistent courses, conduct and/or derived substantial revenue from goods used or consumed or services rendered in the State of New York and expected or should have reasonably expected its acts to have consequences within the State of New York and/or derived substantial revenue from interstate or international commerce.

4. Upon information and belief, that at all times hereinafter mentioned, the Defendant, UE KINGSWOOD TWO LLC, at all times of the institution of this action, was and still is a foreign business corporation, duly organized and existing under the laws of the state of Delaware, with its principal offices located at 231 S LaSalle St, 13th Floor Chicago, IL.

5. Upon information and belief, at all times hereinafter mentioned, the defendant, UE KINGSWOOD TWO LLC, transacted business within the State of New York; regularly did or solicited business within the State of New York or engaged in other persistent courses, conduct and/or derived substantial revenue from goods used or consumed or services rendered in the State of New York and expected or should have reasonably expected its acts to have consequences within the State of New York and/or derived substantial revenue from interstate or international commerce.

6. Upon information and belief, at all times hereinafter mentioned, Defendant, UE KINGSWOOD TWO LLC, leased, owned, managed, and/or controlled the premises located at 1715 East 13th Street, Brooklyn, NY 11229.

7. Upon information and belief, at all times hereinafter mentioned, Defendant, TARGET CORPORATION, leased, owned, managed, and/or controlled the Target retail store located at 1715 East 13th Street, Brooklyn, NY 11229.

8. Upon information and belief, at all times hereinafter mentioned, Defendant, TARGET CORPORATION, its servants, licensees, agents, and/or employees, operated the Target retail store located at 1715 East 13th Street, Brooklyn, NY 11229.

9. Upon information and belief, at all times hereinafter mentioned, Defendant, TARGET CORPORATION, its servants, licensees, agents, and/or employees, controlled the Target retail store located at 1715 East 13th Street, Brooklyn, NY 11229.

10. Upon information and belief, at all times hereinafter mentioned, Defendant, TARGET CORPORATION, its servants, licensees, agents, and/or employees, managed the Target retail store located at 1715 East 13th Street, Brooklyn, NY 11229.

11. Upon information and belief, at all times hereinafter mentioned, Defendant, TARGET CORPORATION, its servants, licensees, agents, and/or employees, maintained the Target retail store located at 1715 East 13th Street, Brooklyn, NY 11229.

12. Upon information and belief, at all times hereinafter mentioned, Defendant, UE KINGSWOOD TWO LLC, had a nondelegable duty to provide the public with a reasonably safe premises and a safe means of ingress and egress, duty of maintaining the premises located at 1715 East 13th Street, Brooklyn, NY 11229; duty to warn of the danger of existing and negligently created defects at the premises located at 1715 East 13th Street, Brooklyn, NY 11229.

13. Upon information and belief, at all times hereinafter mentioned, Defendant, TARGET CORPORATION, its servants, licensees, agents, and/or employees, had a duty to operate, manage, control, and maintain the Target retail store located at 1715 East 13th Street, Brooklyn, NY 11229 in a reasonably safe and suitable condition and state of maintenance and repair.

14. Upon information and belief, at all times hereinafter mentioned, Defendant, TARGET CORPORATION, its servants, licensees, agents, and/or employees, had a duty to warn of the danger of existing and negligently created defects at the Target retail store located at 1715 East 13th Street, Brooklyn, NY 11229.

15. On or about May 17, 2020, at approximately 4:00 PM, while Plaintiff, ZINAIDA KAKAURIDZE, was lawfully walking on the premises of the Target retail store located at 1715 East 13th Street, Brooklyn, NY 11229, Plaintiff was caused to fall as a result of a sticky/wet like/slippery, skid-like condition on the floor.

16. At all times hereinafter mentioned, the floor located on the Target retail store located at 1715 East 13th Street, Brooklyn, NY 11229, was intended for the lawful use of pedestrians and customers.

17. Upon information and belief, on or about May 17, 2020, the floor at the point Plaintiff was caused to fall was a dangerous and hazardous condition constituting a trap that Defendants knew, or in the exercise of reasonable care should, have known of, of its existence and the danger it poses to pedestrians and/or customers.

18. Upon information and belief, Defendants made “special use” of the area and floor that persons traverse at the point Plaintiff was caused to fall.

19. Upon information and belief, on or about May 17, 2020, Defendants caused and/or created the dangerous, hazardous, and unsafe condition upon said premises and Defendant knew or, in the exercise of reasonable care, should have known about the existence of that condition.

20. Upon information and belief, on or about May 17, 2020 and for a substantial period of time prior thereto, Defendants knew or, in the exercise of reasonable care, should have known, of the conditions of the premises at the point Plaintiff was caused to fall could or would be likely to render the floor dangerous, perilous, and hazardous to traverse, with the likelihood of injury and harm to patrons lawfully using the same.

21. This action falls within one or more of the exceptions set forth in Section 1602 of CPLR.

22. The aforesaid occurrence was caused by the negligence, carelessness and recklessness conduct of Defendants, TARGET CORPORATION and UE KINGSWOOD TWO LLC, in the ownership, operation, maintenance, management and/or control of the premises located at 1715 East 13th Street, Brooklyn, NY 11229, without any negligence, carelessness and/or recklessness on the part of Plaintiff contributing thereto.

23. By reason of the foregoing occurrence, Plaintiff, ZINAIDA KAKAURIDZE, sustained serious injury.

24. By reason of the foregoing, Plaintiff has been damaged in an amount, which after the adjustments and calculations expected to be required by the application of article 50-B of the Civil Practice Law and Rules exceeds the jurisdictional limit of all lower courts which would otherwise have jurisdiction.

WHEREFORE, Plaintiff, ZINAIDA KAKAURIDZE, demands judgment against Defendants, TARGET CORPORATION and UE KINGSWOOD TWO LLC, on all causes of action, as follows:

- (a) In an amount which exceeds the jurisdictional limits of all lower court which would otherwise have jurisdiction;
- (b) Awarding Plaintiff interests, costs, and disbursements in this action; and
- (c) Granting such and other and further relief as this Court may deem just and proper.

JURY DEMAND

Plaintiff demands a trial by jury.

Dated: Brooklyn, New York
October 21, 2020

RATSENBERG & ASSOCIATES, P.C.

Yours etc.,

BY: S.G. Ovadia
STEPHANIE G. OVADIA, ESQ.

Attorneys for Plaintiff

ZINAIDA KAKAURIDZE

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Brooklyn, New York 11235

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SUMMONS & COMPLAINT

RATSENBERG & ASSOCIATES, P.C.

ATTORNEYS AT LAW

Attorneys for Plaintiff

ZINAIDA KAKAURIDZE

2579 East 17th Street, Suite 51
Brooklyn, New York 11235

Tel. (718) 676-5757

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Pursuant to 22 NYCRR 130-1.1, the undersigned, an attorney admitted to practice in the courts of New York State, certifies that, upon information and belief and reasonable inquiry, the contentions contained in the annexed document are not frivolous.

Dated:October 21, 2020..

Signature: *S.G. Ovadia*

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Print Signer's Name: STEPHANIE G. OVADIA, ESQ